

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

L.E., by his next friends and parents,  
SHELLEY ESQUIVEL and MARIO  
ESQUIVEL,

Plaintiff,

v.

BILL LEE, et al.,

Defendants.

Case No. 3:21-cv-00835

Chief Judge Waverly D. Crenshaw Jr.  
Magistrate Judge Alistair E. Newbern

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**SUPPLEMENTAL DECLARATION OF STELLA YARBROUGH**

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I, Stella Yarbrough, am an attorney for Plaintiff L.E., by his next friends and parents, Shelley Esquivel and Mario Esquivel, in the above-captioned matter. I submit, pursuant to 28 U.S.C. §1746, this supplemental declaration in opposition to Defendants' motions for summary judgment. I have personal knowledge of the facts in this declaration. If called upon to testify, I could competently testify to the matters set forth in this declaration.

Attached to this declaration are true and accurate copies of the below items. Where applicable, the numbered paragraph for a particular item indicates that the item has been excerpted.

1. A true and accurate copy of excerpts of the transcript of the Deposition of Donald Dodgen, dated July 28, 2022, is attached as Exhibit 1 to this Supplemental Declaration.
2. A true and accurate copy of email correspondence between Shelley Esquivel and John Bartlett, dated March 4 – March 5, 2021, produced as Attachment 1 of Plaintiff's

Responses to Defendant Knox County Board of Education's First Set of Interrogatories and Bates stamped TNLE00000017-18, is attached as Exhibit 2 to this Supplemental Declaration.

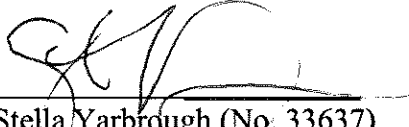
3. A true and accurate copy of Tennessee State Board of Education Rule 0520-01-23, October 2022 (revised), is attached as Exhibit 3 to this Supplemental Declaration.

4. I have reviewed the video recording of the Tennessee House K-12 Subcommittee Hearing dated February 9, 2021, which is available at <https://tinyurl.com/5633tyrc>. At 45:50, a person identified as Rep. Michele Carringer states, "I was born a girl, they were born a boy. And from my religious background, I mean, I believe that's how it is. God made men and women and there was a reason why we were created differently."

5. I have reviewed the video recording of the Tennessee Senate Floor Session Hearing dated March 1, 2021, which is available at <https://tinyurl.com/5y53n95d>. At 51:10, a person identified as Sen. Paul Rose states, "So God created man in His own image, an image of God created He him, male and female created He them."

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 4, 2022

  
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